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11 *Attorneys for MML Investment Advisers, LLC on behalf*  
12 *of the MassMutual Funds*

13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 In re:

17 PG&E CORPORATION; PACIFIC GAS  
18 AND ELECTRIC COMPANY,

19 Reorganized Debtors.

20 ☐ Affects PG&E Corporation  
21 ☐ Affects Pacific Gas and Electric Company  
22 ☒ Affects both Debtors

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)  
(Jointly Administered)

Date: December 19, 2023  
Time: 10:00 a.m. (PT)  
Before: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, California 94102

23 **MML INVESTMENT ADVISERS, LLC PRE-HEARING**  
24 **STATEMENT REGARDING THE DECEMBER 19, 2023 HEARING**

25 MML Investment Advisers, LLC ("MML Advisers") hereby submits this pre-hearing  
26 statement for the December 19, 2023 Hearing before the Court on behalf of MM S&P 500® Index  
27 Fund; MM Select Equity Asset Fund<sup>1</sup>; MassMutual Select Diversified Value Fund<sup>2</sup>; MassMutual  
28 Select Equity Opportunities Fund<sup>3</sup>; MassMutual Select Mid-Cap Value Fund<sup>4</sup>; MassMutual Select  
T. Rowe Price Large Cap Blend Fund; MassMutual Select T. Rowe Price Small and Mid-Cap

<sup>1</sup> MM Select Equity Asset Fund has been renamed MM Equity Asset Fund.

<sup>2</sup> MassMutual Select Diversified Value Fund has been renamed MassMutual Diversified Value Fund.

<sup>3</sup> MassMutual Select Equity Opportunities Fund has been renamed MassMutual Equity Opportunities Fund.

<sup>4</sup> MassMutual Select Mid-Cap Value Fund has been renamed MassMutual Mid Cap Value Fund.

1 Blend Fund; MassMutual Premier Disciplined Value Fund<sup>5</sup>; MassMutual Premier Main Street  
2 Fund<sup>6</sup>; MML Blend Fund; MML Equity Fund; MML Equity Income Fund; MML Equity Index  
3 Fund; MML Income & Growth Fund; MML Managed Volatility Fund; MML Mid Cap Value  
4 Fund; MassMutual Select Strategic Bond Fund<sup>7</sup>; MassMutual Premier Balanced Fund<sup>8</sup>; and MML  
5 Dynamic Bond Fund (collectively, the “MassMutual Funds”). Each of the MassMutual Funds is  
6 a Securities Claimant, as that term is defined in the Court’s *Order (i) Denying Securities Lead*  
7 *Plaintiff’s Motion to Apply Bankruptcy Rule 7023 to Class Proof of Claim and (ii) Extending Bar*  
8 *Date for Certain Holders of Securities Claims for Rescission or Damages* [Dkt. No. 5943] and has  
9 timely filed Securities Claims.<sup>9</sup>

10 The MassMutual Funds join in the requests of Baupost [Dkt. No. 14225] and PERA [Dkt.  
11 No. 14228] seeking to have the Court grant Securities Claimants, including the MassMutual Funds,  
12 at least ninety (90) days to respond to Reorganized Debtors’ claims objections. A response period  
13 of no less than ninety (90) days is appropriate in light of, among other things, the length and scope  
14 of the Debtors’ objections, the voluminous documents and exhibits submitted in support of those  
15 objections, and the discovery that will be necessary in connection therewith. The MassMutual  
16 Funds propose that the Debtors meet and confer with each affected Securities Claimant, including  
17 the MassMutual Funds, in an effort to consensually set a discovery schedule.

18 In light of the foregoing, the MassMutual Funds respectfully submit that the Court should  
19 approve a 90-day response deadline, subject to reasonable extension if required to complete  
20 discovery.

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25 <sup>5</sup> MassMutual Premier Disciplined Value Fund has been renamed MassMutual Disciplined Value Fund.

26 <sup>6</sup> MassMutual Premier Main Street Fund has been renamed MassMutual Main Street Fund.

27 <sup>7</sup> MassMutual Select Strategic Bond Fund has been renamed MassMutual Strategic Bond Fund.

28 <sup>8</sup> MassMutual Premier Balanced Fund has been renamed MassMutual Balanced Fund.

<sup>9</sup> The MassMutual Funds’ Securities Claims are reflected at Claim Nos. 99486, 99516, 99723, 99683, 99524, 99517, 100099, 99773, 99525, 99528, 100395, 100452, 100363, 100181, 99529, 99531, 100489, 100501, 99771, 99767, 99706, 99544, 100197, 100254, 100038, 100036, 99804, 99801, 100457, 100456, 100291, 100186, 100222, 100102, 100462, 100425, 100164, 100423, 100454, 100453, 99772, 100364, 100374, and 100404.

1  
2 Dated: December 19, 2023

Respectfully submitted,

3  
4 By: /s/ Kizzy L. Jarashow

5 Kizzy L. Jarashow (*pro hac vice*)

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